

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION

TRAVELERS CASUALTY AND  
SURETY COMPANY OF AMERICA,

Plaintiff,

vs.

CASE NO.: 1:08-cv-50008

YOUNG CONSTRUCTION & PAVING,  
LLC, KAREN B. YOUNG, GORDON T.  
YOUNG, JEFFREY D. YOUNG,  
MONICA L. YOUNG, JOSEPH WELLS,  
TERRI WELLS, LUKE D. VANDER  
BLEEK and JOAN L. VANDER BLEEK,

Defendants.

**BRIEF IN SUPPORT OF DEFENDANTS' REPLY TO  
PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION**

NOW COMES the Defendants, YOUNG CONSTRUCTION & PAVING, LLC, KAREN B. YOUNG, GORDON T. YOUNG, JEFFREY D. YOUNG and MONICA L. YOUNG, by their attorneys, BARRICK, SWITZER, LONG, BALSLEY & VAN EVERA, and concur in the Brief filed herein by the Defendants, VANDER BLEEK and WELLS.

Specifically, the Defendants MONICA L. YOUNG and KAREN B. YOUNG, have not been actively involved in the business known as YOUNG CONSTRUCTION & PAVING, LLC. The Defendants do not have firsthand knowledge of the allegations set forth in the Brief filed by Defendants, VANDER BLEEK and WELLS. If the allegations are true, one or more of the Defendants herein have a basis for a defense.

The Defendants request the Court for an opportunity to conduct limited discovery prior to the hearing on the Motion for Preliminary Injunction in order to

determine misrepresentations that may have been perpetrated by the agent for the Plaintiff.

Respectfully submitted,

BARRICK, SWITZER, LONG,  
BALSLEY & VAN EVERA

By:

/s/Stephen G. Balsley  
STEPHEN G. BALSLEY

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LUKE D. VANDER BLEEK and JOAN L.  
VANDER BLEEK,

Defendants.

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**NOTICE OF FILING**

I HEREBY CERTIFY that on March 28, 2008, I electronically filed the foregoing **Brief in Support of Defendants' Reply to Plaintiff's Motion for Preliminary Injunction** with the Clerk of the United States District Court, Northern District of Illinois, for the Western Division, using the CM/ECF system, that I have served all CM/ECF Registered Participants, as reflected on the Notice of Electronic Filing and that I have served all non CM/ECF participants by mailing a copy via first-class U.S. Mail, with proper postage prepared and affixed thereon, on March 28, 2008.

/s/Stephen G. Balsley  
STEPHEN G. BALSLEY

**PROOF OF SERVICE**

I HEREBY CERTIFY that on March 28, 2008, I have served all CM/ECF Registered Participants as reflected on the Notice of Electronic Filing and that I have served all non CM/ECF participants by mailing a copy via first class U.S. Mail, with proper postage prepared and affixed thereon, on March 28, 2008.

/s/Stephen G. Balsley  
STEPHEN G. BALSLEY

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